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ESSEX COUNTY OFFICE
SEVEN HUTTON AVENUE
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MORRIS COUNTY OFFICE
15 MOUNT KEMBLE AVENUE
MORRISTOWN, NEW JERSEY 07960

September 13, 2018

VIA ECF

Honorable Brian R. Martinotti, U.S.D.J.
U. S. District Court for the District of New Jersey
Clarkson S. Fisher Building
402 East State Street, Room 2020
Trenton, New Jersey 08608

**Re: Curley v. Monmouth County Board of Chosen Freeholders, et al.,
Civil Action No.: 3:17-cv-12300-BRM-TJB**

Dear Judge Martinotti:

Please be reminded that this office represents Defendants' Monmouth County Board of Chosen Freeholders, et al., (hereinafter the "County Defendants") in the above-referenced matter.

On behalf of the above-defendants pursuant to L. Civ. R. 6.1(b), we hereby request an automatic extension of time to file a Responsive Pleading to Plaintiff John Curley's Second Amended Complaint. Informal service of same occurred on August 23, 2018 and in accordance with Fed. R. Civ. P. 6 the original deadline to file a responsive pleading is today, September 13, 2018 at 11:59 P.M.

However, in light of Plaintiff naming two new defendants in this matter, Freeholders Gerry P Scharfenberger and Patrick Impreveduto; Plaintiff has requested, and the undersigned has timely agreed to and executed waivers of service as to these Defendants on the condition that the period of time to file a responsive pleading be extended as to all named Defendants.

In response to this request, the undersigned and Plaintiff's counsel have reached an agreement to extend the deadline for all Defendants to file responsive pleadings by October 17, 2018.

In light of same, we hereby respectfully ask for Your Honor's approval of this extension of time, such that the new deadline for all Defendants to file responsive pleadings is October 17, 2018.

Hon. Brian R. Martinotti, U.S.D.J.
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Should Your Honor's Chambers have any questions or require that a formal motion be filed, please do not hesitate to contact the undersigned directly at (973)538-1230. Thank you for your consideration.

Respectfully submitted,
O'DONNELL McCORD, P.C.
/s/ Jonathan Testa, Esq.
JONATHAN TESTA

JT:

cc: Angelo Genova, Esq. (Attorney for Plaintiff)
Bruce P. McMoran, Esq. (Attorney for Co-Defendants Fitzgerald & O'Connor)
Matthew J. O'Donnell, Esq.